

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

SUNG KOOK (BILL) HWANG and
PATRICK HALLIGAN,

Defendants.

22 Cr. 240 (AKH)

DECLARATION OF JORDAN ESTES IN
SUPPORT OF DEFENDANT SUNG KOOK
(BILL) HWANG'S MOTION FOR THE
ISSUANCE OF RULE 17(C) SUBPOENAS

I, Jordan Estes, an attorney duly admitted to practice before this Court, hereby declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, as follows:

1. I am a partner at the law firm of Kramer Levin Naftalis & Frankel LLP, counsel for Defendant Sung Kook (Bill) Hwang in the above-captioned matter.

2. I submit this Declaration to provide the Court with documents and information pertinent to Mr. Hwang's reply memorandum in support of his motion for the issuance of Rule 17(c) subpoenas.

3. To the best of my knowledge, information, and belief, the exhibits to this Declaration are true and correct copies of the following documents.

4. Exhibit A is a copy of the revised proposed subpoena to Bank of Montreal.

5. Exhibit A-1 is a redline comparing the revised proposed subpoena to Bank of Montreal to the original proposed subpoena to Bank of Montreal that was filed as Exhibit A to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-1.

6. Exhibit B is a copy of the revised proposed subpoena to Credit Suisse.

7. Exhibit B-1 is a redline comparing the revised proposed subpoena to Credit Suisse to the original proposed subpoena to Credit Suisse that was filed as Exhibit B to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-2.

8. Exhibit C is a copy of the revised proposed subpoena to Deutsche Bank.

9. Exhibit C-1 is a redline comparing the revised proposed subpoena to Deutsche Bank to the original proposed subpoena to Deutsche Bank that was filed as Exhibit C to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-3.

10. Exhibit D is a copy of the revised proposed subpoena to Goldman Sachs.

11. Exhibit D-1 is a redline comparing the revised proposed subpoena to Goldman Sachs to the original proposed subpoena to Goldman Sachs that was filed as Exhibit D to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-4.

12. Exhibit E is a copy of the revised proposed subpoena to Jefferies.

13. Exhibit E-1 is a redline comparing the revised proposed subpoena to Jefferies to the original proposed subpoena to Jefferies that was filed as Exhibit E to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-5.

14. Exhibit F is a copy of the revised proposed subpoena to Macquarie.

15. Exhibit F-1 is a redline comparing the revised proposed subpoena to Macquarie to the original proposed subpoena to Macquarie that was filed as Exhibit F to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-6.

16. Exhibit G is a copy of the revised proposed subpoena to Mizuho.

17. Exhibit G-1 is a redline comparing the revised proposed subpoena to Mizuho to the original proposed subpoena to Mizuho that was filed as Exhibit G to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-7.

18. Exhibit H is a copy of the revised proposed subpoena to Morgan Stanley.
19. Exhibit H-1 is a redline comparing the revised proposed subpoena to Morgan Stanley to the original proposed subpoena to Morgan Stanley that was filed as Exhibit H to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-8.
20. Exhibit I is a copy of the revised proposed subpoena to MUFG.
21. Exhibit I-1 is a redline comparing the revised proposed subpoena to MUFG to the original proposed subpoena to MUFG that was filed as Exhibit I to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-9.
22. Exhibit J is a copy of the revised proposed subpoena to Nomura.
23. Exhibit J-1 is a redline comparing the revised proposed subpoena to Nomura to the original proposed subpoena to Nomura that was filed as Exhibit J to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-10.
24. Exhibit K is a copy of the revised proposed subpoena to UBS.
25. Exhibit K-1 is a redline comparing the revised proposed subpoena to UBS to the original proposed subpoena to UBS that was filed as Exhibit K to Mr. Hwang's Motion for the Issuance of Rule 17(c) Subpoenas, *see* ECF No. 79-11.
26. Exhibit L is a copy of a Goldman Sachs document describing its algorithmic strategies, which was produced at Bates Number SDNY_P001_0004961452.
27. Exhibit M is a copy of a UBS document describing its algorithmic strategies, which was produced at Bates Number SDNY_P001_0000584711.
28. Exhibit N is a copy of a Nomura document describing its algorithmic strategies, which was produced at Bates Number SDNY_P004_0000435394.

29. Exhibit O is a copy of a series of text messages between an employee of Credit Suisse and the head trader of Archegos Capital Management, which were extracted from a Cellebrite Report produced at Bates Number SDNY_SW_00000000001.

30. Exhibit P is a copy of a series of emails involving Credit Suisse and Archegos Capital Management, which was produced at Bates Number SDNY_P001_0003446317.

31. The call referenced on page 19 of the reply memorandum was produced by the government at Bates Number SDNY_004_00001120. The language quoted on page 19 is a true and accurate excerpt of the call.

32. The call referenced on pages 16-17 of the reply memorandum was produced by the government at Bates Number SDNY_P001_0006959503. The language quoted on pages 16-17 is a true and accurate excerpt of the call.

Dated: New York, New York
September 27, 2023

/s/ Jordan Estes
Jordan Estes